

## REMARKS

Applicant appreciates the Examiner's efforts in review and discussing the above-captioned matter with the undersigned. In an Office Action dated March 8, 2007, the Examiner rejected claims 1, 2, 4, 6-8, and 11-24 under 35 U.S.C. § 112, first paragraph. During a telephone interview of May 10, 2007, the Examiner indicated that the amendments and replacement drawing sheet presented herewith would overcome the § 112 rejection. The Examiner further indicated that the patentability of the proposed amendment would need to be further assessed. Specifically, the Examiner alluded to a hesitation to indicate the allow ability of the pending claims over Hennecken (USP 6,040,253).

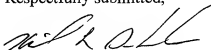
As amended here in, the pending claims define a press pad construction that includes at least two types of threads were in the two types of thread have generally equal diameters and yet differing elasticities. Hennecken, alone or in combination with any of the other art of record, does not disclose, teach, or suggest a press pad having such a construction. That is, whereas Hennecken discloses a fiber having a metallic core and an outer layer (Fig. 3; C. 4, ll. 1-14), there is no disclosure or suggestion in Hennecken for the formation of a press pad having a number of thread types were in the comparable types have generally similar diameters and dissimilar elasticities as called for in the present claims.

Accordingly, Applicant believes that which is called for in the claims is patentably distinct over Hennecken, the other of record, and any combination thereof. Therefore, Applicant respectfully requests a notice of allowance of claims 1, 2, 4, 6-8 and 11-24. Alternatively, Applicant respectfully request entry of the amendments and replacement drawing sheet presented herewith as these amendments remove issues from appeal. Furthermore, although no fees are believed due with this submission, the Office is hereby authorized to charge any applicable fees, or credit any overpayments, to deposit account number 50-1170. The Examiner is cordially invited to contact the

Applicant: ESPE  
Serial No. 10/617,977  
Page 7 of 7

undersigned should any informal matters remain which would hinder the passage of the above-captioned matter to issuance.

Respectfully submitted,



Kirk L. Deheck  
Registration No. 55,782  
[kld@boylefred.com](mailto:kld@boylefred.com)

Dated: May 10, 2007

USPTO Customer No. 23,598  
Boyle, Fredrickson, Newholm, Stein & Gratz, S.C.  
250 East Wisconsin Avenue, Suite 1030  
Milwaukee, WI 53202  
Telephone: (414) 225-9755  
Facsimile: (414) 225-9753